

BARRACK, RODOS & BACINE

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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

☒ Affects Both Debtors

☐ Affects PG&E Corporation

☐ Affects Pacific Gas and Electric
Company

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**JOINDER OF GOVERNMENT
EMPLOYEES' RETIREMENT SYSTEM OF
THE VIRGIN ISLANDS TO SECURITIES
LEAD PLAINTIFF'S OBJECTION TO
REORGANIZED DEBTORS' MOTION TO
APPROVE SECURITIES ADR AND
RELATED PROCEDURES FOR
RESOLVING SUBORDINATED
SECURITIES CLAIMS [D.I. 9189]**

1 Government Employees' Retirement System of the Virgin Islands, the holder of a
2 Securities Claim¹ and a creditor in the chapter 11 bankruptcy cases (the "**Chapter 11 Cases**") of
3 the above-captioned reorganized debtors (the "**Debtors**", or as reorganized pursuant to the Plan,
4 the "**Reorganized Debtors**"), by and through its undersigned counsel, submits this joinder
5 ("**Joinder**") to *Securities Lead Plaintiff's Objection to Reorganized Debtors' Motion to Approve*
6 *Securities ADR and Related Procedures for Resolving Subordinated Securities Claims* [Docket
7 No. 9189] (the "**Securities ADR Objection**"), in opposition to *Reorganized Debtors' Motion to*
8 *Approve Securities ADR and Related Procedures for Resolving Subordinated Securities Claims*
9 [Docket No. 8964] (the "**Securities ADR Motion**"). In support of this Joinder, Government
10 Employees' Retirement System of the Virgin Islands, respectfully states as follows:

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12 **JOINDER AND RESERVATION OF RIGHTS**

13 1. Government Employees' Retirement System of the Virgin Islands is a Securities
14 Claimant and timely filed proofs of claim against the Debtors by the Extended Bar Date (Claim
15 Nos. KKMID27423 and @JOLW27423).

16 2. Government Employees' Retirement System of the Virgin Islands incorporates by
17 reference and hereby joins in all arguments set forth in the Securities ADR Objection.

18 3. Government Employees' Retirement System of the Virgin Islands reserves its right
19 to supplement this Joinder and further reserves its rights to participate in any hearing to consider
20 the Securities ADR Motion, including its rights to make any arguments and to examine
21 witnesses.

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26 ¹ Capitalized terms not defined herein shall have the meaning ascribed to them in the Securities
27 ADR Objection (as defined herein) and the Securities ADR Motion (as defined herein), as
28 applicable.

1 **CONCLUSION**

2 For all of the foregoing reasons, Government Employees' Retirement System of the
3 Virgin Islands respectfully requests that this Court enter an Order denying the Securities ADR
4 Motion and granting such other and further relief as may be just and proper.
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6 Dated: October 6, 2020

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